

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): August 21, 2019
2. Deadline for first request for production of documents and first request for interrogatories: September 20, 2019
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) 10 ; defendant(s) 10
Defendants object to more interrogatories than what are provided for under the federal rules.
3. Date for completion of any joinder of additional parties and amendment of the pleadings: September 20, 2019
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) N/A ; defendant(s) N/A
4. Number of depositions by plaintiff(s) of: parties 4 ; non-parties 6
5. Number of depositions by defendant(s) of: parties 1 ; non-parties 3
6. Date of status conference (joint status report due two business days in advance): December 18, 2019
7. Date for completion of factual discovery: February 21, 2020
8. Are expert witnesses needed? Yes No X
 - 8(a). Number of expert witnesses, if any, of plaintiff(s): medical N/A ; non-medical N/A
 - 8(b). Date for completion of those expert reports: N/A
 - 8(c). Number of expert witnesses, if any, of defendant(s): medical N/A ; non-medical N/A
 - 8(d). Date for completion of those expert reports: N/A
9. Date for completion of expert discovery: N/A
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): March 4, 2020
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions:
Motion to dismiss (see ECF No. 15)
Motion for summary judgment (April 17, 2020)

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:

Defendants anticipate filing a pre-motion letter seeking leave to file a motion to dismiss some claims raised in the Amended Complaint.

Motion for summary judgment (April 17, 2020)

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)

Yes No

The parties intend to enter into an ESI protocol

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)

Yes No

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.)

Yes No